

Friends of Merrymeeting Bay

P.O. Box 233
Richmond, ME 04357

COMMENTS on DRAFT ANDROSCOGGIN TMDL PLAN

February 18, 2005

We appreciate the extensive modeling and field work the Department has undertaken to arrive at this proposed TMDL plan. However, we must bear in mind that this is years overdue and still not stringent enough for the general health of the river though in fact it may in the end meet minimal standards for particular elements of concern [DO, TSS, BOD, P & ortho-P].

The document does not appear to clearly specify what reductions the dischargers need take or come up with an allocation plan to institute. Continued negotiations with dischargers are likely to lead to more of the same, which is to say continued delay.

We don't believe an adequate case is made for the uptake of phosphorus [P] in the river section above Gulf Island Pond [GIP]. As plants in that section reach their maximum capacity for uptake excess P will make its way to GIP. Estimates made therefore of allowable discharge would appear not conservative enough to prevent loading of the Pond. The TMDL notes that collective dilution at 7Q10 flow is very low resulting in poor capacity provided by GIP for excessive nutrients.

We don't feel that there has been an adequate demonstration that proposed TSS discharges will prevent non-attainment and in fact they may likely impact aquatic life.

Looking at the big picture, we believe the Department must look to elimination of point source discharges plus necessary O2 supplementation as needed assuming dam removal does not occur. Millions of gallons a day discharge by the mills are responsible for the bulk of river degradation. While the TMDL focuses on a subset of elements, we can't forget that there are a host of unknown constituents that continue to be discharged and that all of the companies involved run cleaner low flow operations elsewhere.

We found possible evidence in the Kennebec below SAPPI in 2003 of endocrine disrupters and what we know now is likely just the tip of the iceberg.

Thank you for the opportunity to comment.

Sincerely,

Ed Friedman, Chair